



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Jacob K. Javits Federal Building
26 Federal Plaza
New York, New York 10278*

December 13, 2024

BY ECF

Honorable Richard M. Berman
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York

**Re: *United States v. Turkiye Halk Bankasi, A.S.,
S6 15 Cr. 867 (RMB)***

Dear Judge Berman:

The Government respectfully submits this letter to (i) provide the Court with a stipulated protective order and (ii) request, on behalf of the parties, that the Court schedule a teleconference¹ to address a proposed deposition pursuant to Rule 15 of the Federal Rules of Criminal Procedure. The parties are available Monday, December 16, 2024 if convenient to the Court. The Government further advises the Court that the Second Circuit's stay order, dated December 21, 2020, remains in effect (D.E. 696), but a consent motion to modify the stay in connection with the proposed deposition has been filed.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: /s/
Michael D. Lockard / Jonathan E. Rebold /
Jacob H. Gutwillig
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cc: Defense counsel of record (by ECF)

¹ Because counsel for Halkbank is based in Washington, D.C., the parties request that the Court permit remote participation.